### UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORDAN ISAIAH MAURICE WATTS,

**INDICTMENT** 

Defendant.

The Grand Jury charges:

## <u>Count One</u> (Sexual Exploitation of a Child)

Between on or about January 1, 2023, through March 8, 2023, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

#### **Jordan Isaiah Maurice Watts**

knowingly used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was produced using materials which had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

Specifically, the defendant used a girl who was approximately sixteen years old to engage in sexually explicit conduct for the purpose of producing a digital video of such conduct. The defendant produced the video on an Apple iPhone, manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

### <u>Count Two</u> (Sexual Exploitation of a Child)

On or about April 12, 2023, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

## Jordan Isaiah Maurice Watts

knowingly used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was produced using materials which had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

Specifically, the defendant used a girl who was approximately seventeen years old to engage in sexually explicit conduct for the purpose of producing a digital video of such conduct. The defendant produced the video on an Apple iPhone, manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

# <u>Count Three</u> (Sexual Exploitation of a Child)

On or about April 15, 2023, in Kalamazoo County, in the Southern Division of the Western District of Michigan,

#### Jordan Isaiah Maurice Watts

knowingly used a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and the visual depiction was produced using materials which had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

Specifically, the defendant used a girl who was approximately seventeen years old to engage in sexually explicit conduct for the purpose of producing one or more digital videos of such conduct. The defendant produced the videos on an Apple iPhone, manufactured outside the State of Michigan.

18 U.S.C. § 2251(a), (e)

FORFEITURE ALLEGATION

(Sexual Exploitation of a Child)

The allegations contained in Counts One through Three of this Indictment are hereby

re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18

U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of an offense in violation of 18 U.S.C. §

2251, as charged in Counts One through Three of the Indictment,

Jordan Isaiah Maurice Watts

shall forfeit to the United States of America any visual depiction described in 18 U.S.C.

§ 2251; any matter which contains any such visual depiction that was produced, transported,

mailed, shipped, or received in violation of Title 18, United States Code, Chapter 110; any

property, real or personal, constituting or traceable to gross profits or other proceeds obtained

from the offense; and any property, real or personal, used or intended to be used to commit

or to promote the commission of the offense or any property traceable to such property,

including but not limited to an Apple iPhone 12 cell phone (Serial # DNPDT59A0DXP).

18 U.S.C. § 2253

18 U.S.C. § 2251

A TRUE BILL

GRAND JURY FOREPERSON

MARK A. TOTTEN

United States Attorney

ERIN K. LANE

JONATHAN ROTH

Assistant United States Attorneys